



## Code Administration Code of Practice

### User feedback form

The Code Administration Code of Practice (CoP)<sup>1</sup> was implemented on 31<sup>st</sup> December 2010. The aim was to facilitate convergence and transparency in code modification processes. The CoP is formally adopted by the UNC, BSC and CUSC, and has been voluntarily observed by other codes.

In accordance with Principle 4, the CoP is subject to periodical review by users. In this first review, we welcome your feedback on how well the CoP Principles are being achieved in practice and any suggested amendments that you would like to raise for consideration.

Please provide your feedback by completing this form and returning your comments to Ofgem **by Friday 20<sup>th</sup> January**:

[industrycodes@ofgem.gov.uk](mailto:industrycodes@ofgem.gov.uk)

If you would like any comments to be considered as confidential, please indicate this clearly.

*Thank you*

**Name:** Gerry Hoggan

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**Which industry code(s) are you actively involved with\*?**

UNC  BSC  CUSC  Other

**How would you characterise your involvement with the above code(s)?**

~~Code Administrator~~ ~~Panel Member~~ Code Signatory ~~Interested Party~~

\* Please indicate in each of your responses which code your comments relate to.

<sup>1</sup> A copy of the Code Administration Code of Practice can be found at <http://www.ofgem.gov.uk/Licensing/IndCodes/CGR/Documents1/FinalCoP.pdf>

**Please share examples of any areas where you have found the application of the CoP Principles particularly successful. Please include any suggestions of 'best practice'.**

**Please share examples of any areas where you have found the application of the CoP Principles particularly *unsuccessful*. Please include any suggestions for improvement.**

## **CUSC**

1. Principle 3 requires that:
  - a. "Websites will have good navigation".
  - b. 'Code Administrator contact information will be readily available; and
  - c. Information will be published in a timely manner'

However, we have found that with National Grid (NG) that their website is difficult to navigate to "Find a Contact". Even when we eventually managed to find the "Contact us" link, this turned out to be not particularly helpful as an error message was generated stating that the email address identified was "no longer valid"

Moreover, there have been a number of instances where NG have advised that by email that documents are available on the website although it then has transpired that the website has not actually been updated at that time with the required documentation or information.

We believe that contact details should be made readily available and that NG should ensure documents are available on the website before issuing a website update email.

2. Principle 7 requires 'Subject to timing and ownership there shall be no restriction on the number of alternative proposals that can be raised'. In practice, this may mean an unwieldy number of alternatives could be raised, as is the case with some CUSC modifications, whereas in the BSC, only one alternative is put forward from a number of potential alternatives.  
While in principle it may be good to generate as many substantive alternatives as possible it may be preferable to have a more consistent, practicable and realistic approach and in particular we believe that a maximum number of alternatives should be imposed. As in the case with the BSC, using the principle that the alternative should better facilitate the applicable objectives than the Proposed and so on, we cannot see there should be more than a couple of alternatives.
3. Principle 8 requires that 'Lessons learnt will be captured and shared where actual costs prove to be significantly different (either higher or lower) to the estimates'. We are not aware that this post-implementation analysis and review has been carried out or planned yet or if so we have not seen the outcome of such exercises. It may also be worthwhile to consider extending this analysis/review to include some 'value for money' audits on sample cost benefit analyses in respect of modification to determine whether anticipated benefits have been realised.

## **BSC and CUSC**

4. Principle 10 requires that 'Notice of consultations will be distributed broadly using all normal communication channels'. Elexon occasionally issue consultations (e.g. recent CAP price) via their Newscast publication (which is really a 'for information' medium). Additionally there have been some occasions where we have not received (though others in our organisation have) consultation notices from NG which we have only subsequently discovered via other means e.g. website updates, Elexon Newscast (e.g. SMAF consultation). In all cases, we believe that consultations should be published by specific notification to a to a general distribution list. We have provided further detail of these examples in the appendix to this response.

Overall we have not encountered such issues with the UNC and the Joint Office of Gas Governance.

**How useful do you consider the standardised processes, timetables and documents to be, as set out in the CoP?**

The standardised timetable is particularly useful as it provides an indication of the potential implementation dates for any proposed code changes.

**Do you consider that the standardised processes, timetables and documents have been successfully implemented in the code(s)?**

We consider that the standardised processes and timetables have been successfully implemented in across the various code processes. Whilst it is important to ensure that modifications are considered in a timely manner and are not allowed to languish with no substantive progress being made, nonetheless, it will always be that case that some workgroups may require additional time to complete their development and analysis of a modification proposal. As such any requests for extensions to timetables should be given adequate consideration by the relevant Panel to ensure that those modifications are given due consideration and are not submitted for consultation prematurely.

**In respect of Principle 1, which describes the role of Code Administrators as 'critical friends', if you are a code user, how would you evaluate the implementation of this principle in 2011?**

N/A

**Have you identified any additional areas that you feel it would be helpful for the CoP to cover? If so, please describe how you feel this would improve the code administration processes.**

No

**Are there any areas of the CoP that you have found to be inconsistent with other code processes? Please identify any specific examples.**

The number of alternative modifications allowed across the Codes remains inconsistent as mentioned above.

**Have you identified any parts of the CoP that you feel should be removed or amended? If so, please explain your reasons for this.**

No

**Do you feel it would be useful at this stage to impose KPI targets on the Code Administrators (whereas currently KPI data is recorded, but no targets are set)?**

We have not yet identified any need or demand for this, particularly allowing for the additional administrative burden and expense that this would bring for what may fairly marginal benefits. However, it may be appropriate to revisit this aspect once you have had a chance to evaluate the overall feedback you receive from this review.

**How would you rate your experience of the overall usefulness of the CoP?**

<b>CODE</b>	<b>Very poor</b>	<b>Poor</b>	<b>Neutral</b>	<b>Good</b>	<b>Excellent</b>
<b>BSC</b>				√	
<b>CUSC</b>				√	
<b>UNC</b>				√	

**Do you have any other comments?**

Appendix (example details):

- Poor website navigation** - In trying to report a “Website Publishing” fault to NG, we tried the “Find a Contact” and could only answer the first question as “General Enquiries” and none of the rest. If there are Webpage problems / hyperlink problems / missing information etc, these contact details should be made readily available
- Code Administrator contact information will be readily available** - we had great difficulty in finding who we should contact regarding Website related queries and we are still not convinced that we are contacting the correct address. After trying to navigate (unsuccessfully) through the website “Contact us” we arrived at what we thought was the Customer Support Team for complaints (page copied below), only to find that the email address ([customersupport@uk.ngrid.com](mailto:customersupport@uk.ngrid.com)) is “no longer valid”.
- Information Not Published in a timely manner** - NG issued an email on Wednesday 4<sup>th</sup> January 2012 informs us of the publishing of three “Terms of reference” for Workgroups – for CMP201, CMP202 and CMP203. However, after repeatedly checking for two days, the hyperlinks continued to say “There are no items to show in Terms of reference”. This we believe is not a “timely manner” and such instances potentially could result in such documentation being missed as a result of “forgetting” to continue to check the website, with the significant consequential loss of opportunity to participate in those Workgroups.